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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 HSBC BANK, USA, N.A., AS TRUSTEE  
28 ON BEHALF OF ACE SECURITIES  
29 CORP. HOME EQUITY LOAN TRUST  
30 AND FOR THE REGISTERED HOLDER  
31 OF ACE SECURITIES CORP. HOME  
32 EQUITY LOAN TRUST, SERIES 2006-  
33 ASAP5, ASSET BACKED PASS-  
34 THROUGH CERTIFICATES,

35 Plaintiff,

36 vs.

37 FIDELITY NATIONAL TITLE GROUP,  
38 INC., et al.,

39 Defendants.

Case No.: 2:21-cv-00153-KJD-NJK

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 6] AND MOTION FOR FEES AND  
COSTS [ECF No. 7]**

**(First Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff HSBC Bank  
2 USA, N.A., as Trustee on behalf of ACE Securities Corp. Home Equity Loan Trust and for the  
3 registered holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-ASAP5, Asset  
4 Backed Pass-Through Certificates (“HSBC Bank”) (collectively, the “Parties”), by and through  
5 their counsel of record, hereby stipulate and agree as follows:

- 6 1. On January 28, 2021, HSBC Bank filed its Complaint in the Eighth Judicial District  
7 Court, Case No. A-21-828578-C [ECF No. 1-1];
- 8 2. On January 23, 2021, Chicago Title filed a Petition for Removal to this Court [ECF  
9 No. 1];
- 10 3. On March 1, 2021, HSBC Bank filed a Motion for Remand [ECF No. 6];
- 11 4. On March 1, 2021, HSBC Bank filed a Motion for Costs and Fees [ECF No. 7];
- 12 5. Chicago Title’s deadline to respond to HSBC Bank’s Motion for Remand and Motion  
13 for Costs and Fees is March 15, 2021;
- 14 6. Chicago Title’s counsel is requesting an extension until April 6, 2021, to file its  
15 response to the pending Motion for Remand and Motion for Costs and Fees;
- 16 7. Chicago Title requests a brief extension of time to respond to the Motion for Remand  
17 and Motion for Costs and Fees to afford Chicago Title additional time to respond to  
18 the legal arguments set forth in HSBC Bank’s motions;
- 19 8. HSBC Bank does not oppose the requested extension;
- 20 9. This is the first request for an extension which is made in good faith and not for  
21 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to HSBC Bank's  
2 Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended  
3 through and including April 6, 2021.

4  
5 Dated: March 11, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: March 11, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: March 11, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff HSBC BANK, U.S.A,  
N.A.

18 **IT IS SO ORDERED:**

19  
20 Dated: 3/12/2021

21 By:   
22 UNITED STATES DISTRICT COURT JUDGE  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

